

A LIMITED LIABILITY COMPANY

August 15, 2007

Federal Communication Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Comments to Proposed Limit for NCE FM New Station Application

Dear Sir or Madam:

I wish to file comments for Network of Glory, LLC to the Public Notice for proposed application limits for the NCE FM new station applications in the October 12 - October 19, 2007 window.

My name is Lola Stradford Richey, and I am a member with Network of Glory, a nonprofit South Carolina limited liability company. Our nonprofit ministry aims to broadcast music and information to the African-American community. Unfortunately, our ministry has tried to obtain licenses to broadcast our ministry to the African-American community with no success. We realize in many areas of the United States many African-Americans have no voice nor access to the radio airwaves, especially in the Black Gospel format.

When the Federal Communication Commission announced a filing window, the Network of Glory pooled its resources and contacted an engineering firm to begin frequency searches. We focused the ministry's frequency searches for cities with a high African-American population. Our ministry expended hundreds and thousand of dollars in engineering fees and costs for frequency searches and to prepare applications for the upcoming NCE FM filing window. As of August 5, 2007, the Network of Glory had completed thirty-seven (37) applications for the upcoming NCE FM new station filing window for cities a high African-American population. With a filing cap of ten (10), our nonprofit organization stands to lose thousands of dollars paid in engineering and other legal costs to prepare for the upcoming NCE FM filing window.

I understand the Commission's concern as to frivolous and speculative filings and other procedural delays. Yet, our organization hopes and pray the Commission imposes other restrictions and limits to prevent frivolous and speculative filings and

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other procedural delays. Many ministries and nonprofit organizations such as ours have a sincere desire to open the airways to unrepresented community groups. Instead of limiting the filings to ten (10) application, the Network of Glory prays the Commission will consider other options to prevent frivolous and speculative filings and other procedural delays.

SUGGESTIONS:

1. Impose a filing fee for all applications filed for the NCE FM filing window in October 12, 2007 through October 19, 2007.
2. Limited the transferability of all newly issued construction permits granted during the NCE FM filing window for seven (7) years. In other words, no organization can transfer or sale the construction permit issued for seven (7) years. This non-transferability provision will hopefully prevent organization from simply filing applications with an intent to sell for a profit and with no intent to build-out a noncommercial broadcast station.
3. Permit a party to an application filed in the NCE FM filing window to hold attributable interests in no more than fifty (50) applications provided more than thirty (30) of the applications are for rural communities as defined by USDA. For example, ABC Nonprofit Corporation files forty-five applications of which twenty-five (25) applications are for communities in rural Alabama, Mississippi, Kentucky, and Louisiana. This limit and deference will ensure rural, poor and other under-served populations will obtain access to the airwaves and radio programming.
4. Limit filings during the NCE FM filing window to forty (40) applications for per party giving a credit for attributable interests in an existing radio station (FM, LPFM, AM and FM translators) or construction permit to build such facilities. For example, XYZ Non-Profit Corporation already has an attributable interest in seventeen (17) other FM, LPFM, AM and FM translators radio stations can only file twenty-three (23) applications during the NCE FM filing window. This restriction limit will give other organizations and demographic groups an opportunity to obtain a voice through the radio medium that previously held no attributable interest in a broadcast station.
5. Increase the filing cap a party can file during the NCE FM filing window to thirty (30).

Our organization prays the Commission will consider the time and money our organization has spent to prepare applications for thirty-seven cities. We

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understand some organization has no commitment to help the community but proposing a cap of ten would be a devastating loss. Our ministry has tried to obtain broadcast licenses to broadcast Black Gospel to the African-American community. Still, no current licensee will even consider our ministry. For our nonprofit ministry, this may be the only opportunity to reach poor and rural communities adequately. I pray the Federal Communication Commission will not impose such a strict cap and increase the cap to forty (40) applications.

Respectfully submitted,

Lola Stradford Richey,
Network of Glory